

SHER TREMONTE LLP

September 21, 2017

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Galanis et al.*, 16-cr-371 (RA)

Dear Judge Abrams:

We write on behalf of our client, Gary Hirst, and with the consent of counsel for co-defendants John Galanis, Michelle Morton, Devon Archer, and Bevan Cooney, to respectfully request an adjournment of the motions deadline currently set for October 2, 2017. This is our first request for an adjournment.

On August 3, 2017, the Court ordered the government to make rolling productions of the discovery obtained from search warrants of Messrs. Archer and Cooney's emails. We received one such production on September 18, 2017 (we understand that other defendants received an additional production some weeks earlier, which we have not yet received). The government has informed us that these productions do not represent the sum total of discovery it intends to turn over; rather, the government is approximately one-third of the way through its responsiveness review and expects to produce several thousand more emails, though not before October 2. Therefore, we are not currently and will not be in possession of all of the discovery before the motions deadline. In addition, we have not completed our review of the previously produced discovery due to its substantial volume.

Accordingly, we respectfully request that the Court adjourn the motions deadline of October 2, 2017, and either set a deadline for no less than thirty days after the government completes its production or, in the alternative, schedule a conference at that

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time to set a new motions schedule. We have spoken to Assistant U.S. Attorney Rebecca Mermelstein who has informed us that the government objects to this request.

Respectfully submitted,

/s/ Michael Tremonte

Michael Tremonte

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SHER TREMONTE LLP

cc: All counsel (via ECF)